IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

Bankruptcy No.: 07-27594-BM

Chapter 11

Related to Claim No. 10-1, 10-2

PNC Bank NA,

Movant

v.

Laura J. McLaughlin,

Respondent(s)

MOTION TO REOPEN CHAPTER 11 CASE

(For Purposes of Restricting Access to Non-Public Personal Information)

COMES NOW, PNC Bank NA ("Secured Creditor"), pursuant to Fed. R. Bankr. P. 5010 and 11 U.S.C. § 350(b), and moves this Court to reopen the instant Chapter 11 case for cause, and as grounds thereof states as follows:

- Upon review of the documents filed in this case, Secured Creditor has identified
 issues regarding redaction of non-public personal information. Pursuant to
 W.PA.LBR 9037-1, attached hereto is the Request to Restrict Public Access to Claim
 (Local Bankruptcy Form 37).
- 2. Secured Creditor requests the Court reopen the instant case to restrict access to the affected documents and allow for remediation of these issues.

WHEREFORE, Secured Creditor, PNC Bank, N.A., respectfully requests this Honorable Court enter an order reopening the case, and for such other and further relief as the Court deems just and proper.

Dated: April 14, 2021

Respectfully Submitted,

Robertson, Anschutz, Schneid, Crane & Partners, PLLC

Attorney for Secured Creditor 10700 Abbott's Bridge Rd., Suite 170 Duluth, GA 30097 Telephone: (470) 321-7112

By: <u>/s/ Charles G. Wohlrab</u> Charles G. Wohlrab, Esquire PA Bar Number 314532 Email: cwohlrab@raslg.com

IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

Laura J. McLaughlin,
Debtor(s)

PNC Bank NA,
Movant

V.
Laura J. McLaughlin,
Respondent(s)

Bankruptcy No.: 07-27594-BM

Chapter 11

Related to Claim No. 10-1, 10-2

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 14, 2021, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

Laura J. McLaughlin 2 Ann Street Pittsburgh, PA 15215

John P. Lacher 960 Penn Avenue Suite 1200 Pittsburgh, PA 15222

Robert O Lampl Robert O Lampl Law Office Benedum Trees Building 223 Fourth Avenue, 4th Floor Pittsburgh, PA 15222

Norma Hildenbrand, on Behalf of the United States Trustee by Office of the United States Trustee Suite 970 Liberty Center 1001 Liberty Avenue Pittsburgh, PA 15222 U.S. Trustee Office of the United States Trustee Liberty Center. 1001 Liberty Avenue, Suite 970 Pittsburgh, PA 15222

Respectfully Submitted,

Robertson, Anschutz, Schneid, Crane & Partners, PLLC Authorized Agent for Secured Creditor 6409 Congress Avenue, #100 Boca Raton, FL 33487 Tel: (561) 241-6901

By: <u>/s/ Kayan Johnson</u> Kayan Johnson

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